

CERTIFICATE OF ELECTRONIC TRANSMISSION

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BHGL Ref. No. 10022/350

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application:

Elizabeth DeSchryver et al.

Serial No.: 10/634,250

Filed: August 5, 2003

For: METHODOLOGY FRAMEWORK AND
DELIVERY VEHICLE

Examiner: Padmanabhan, Kavita

Group Art Unit: 2161

Confirmation No.: 7779

REPLY BRIEF

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sirs:

This Reply Brief is being filed further to the Examiner's Answer mailed May 12, 2010. This Reply Brief is filed prior to the end of the two month time window provided under 37 CFR 41.41 and MPEP 1208.

I. Reply to Examiner's Answer

Appellant submits that the pending rejections fail to cite references teaching or suggesting all of the claimed features. Arguments from the Appeal Brief are not repeated below.

A. Claims 6-8 over Leymann**1) “a plurality of documents having a hierarchical linkage”**

The Examiner's Answer argues that Leymann teaches “a plurality of documents having a hierarchical linkage” where the plurality of documents includes “a highest level document” displaying a “set of taxonomies with links to a set of second level documents,” a “second level document representing an activity object...the second level document having links to a group of third-level documents,” and a “third level document representing task objects,” as recited in independent claim 6. However, Leymann fails to disclose a hierarchical arrangement of documents including the three different types of documents: 1) a highest level document displaying the set of taxonomies, 2) a second level document representing an activity object, and 3) a third level document representing task objects. On the contrary, Leymann only discloses a single type of document, the “application service description document.” Leymann, ¶14. Leymann does not disclose or suggest linking multiple documents of different types, or even linking multiple documents of the same type. On the contrary, Leymann generally relates to categorizing the application service description documents in a taxonomy scheme, i.e. assigning a single type of document (application service description document) to a category in a taxonomy scheme, and creating such taxonomy schemes. Leymann, ¶¶16-18. In Leymann, a taxonomy scheme may include multiple categories and sub-categories for classifying the application service documents, such as the categories “Boat,” “Order,” “Price,” “Repair.” Leymann, ¶86. Leymann discloses assigning the application services documents to a single category of the taxonomy scheme. Leymann, ¶87. However, Leymann fails to disclose linking the application service description documents to other types of documents, or even linking the application service documents to one another. It would be impossible for a person of ordinary skill in the art to understand Leymann as disclosing a hierarchical arrangement including three different types of documents because Leymann only discloses a single

type of document. Furthermore, Leymann doesn't disclose a hierarchical arrangement of documents linked together, but rather a taxonomy scheme for categorizing a single document type.

The Examiner's Answer references Fig. 3B and paragraph 86 as disclosing different types of documents linked together in hierarchical arrangement. However, contrary to the assertion of the Examiner's Answer, Fig. 3B and paragraph 86 only further clarify that Leymann discloses a taxonomy scheme having different categories for classifying a single type of document, not a hierarchical arrangement of different types of documents linked together. Leymann discloses that Figs. 3A and 3B show taxonomy schemes containing categories, such as "the category 'Boat,'" and "further categories 'Order', 'Price', 'Repair.'" Leymann, ¶86. Leymann further discloses "[t]he application service documents determined from the example of FIG. 1 are now assigned to a category of the taxonomy scheme in FIG. 3." Leymann, ¶87. Thus, Leymann makes it abundantly clear that Fig. 3B shows a taxonomy scheme containing multiple categories and that a single type of documents, the application service documents, are assigned to one of the categories of the taxonomy scheme. The Examiner's Answer asserts that in Fig. 3B "the first level displays taxonomies, the second level displays activities, and the third level represents a task (for example boat->order->specific url)." Examiner's Answer, p. 7. However, Leymann clearly discloses that Fig. 3B, in its entirety, displays "a taxonomy." Leymann, ¶86. As such, the Examiner's Answer's assertion that the first level of Fig. 3B displays a set of taxonomies is clearly contradictory to the teachings of Leymann. Leymann further clearly discloses that the taxonomy scheme of Fig. 3B contains multiple categories, such as "boat" and "order." As such, the Examiner's Answer's assertion that "boat" is a taxonomy and "order" is clearly contradictory to the teachings of Leymann. In Leymann, "boat," "order," "repair," etc. are merely categories in the taxonomy scheme to which an application service description document may be assigned. Lastly, contrary to the Examiner's Answer's assertion, the categories in the taxonomy scheme in Leymann are clearly not documents, but rather a classification of documents. Thus, Leymann fails to disclose or suggest that the categories are any of: 1) a highest level document displaying the set of

taxonomies, 2) a second level document representing an activity object, or 3) a third level document representing task objects.

2) “receiving from the user, through the electronic display, a methodology mapping selection for a plurality of methodologies”

The Examiner’s Answer asserts that “Leymann also clearly teaches ... allowing the user to navigate the hierarchy ... which requires the user to interact with an electronic display.” Examiner’s Answer, p. 9. The Appellant respectfully disagrees. First, the Appellant notes that the claim language recites “receiving...through the electronic display” not “interacting with an electronic display.” Secondly, even if Leymann discloses allowing the user to navigate the hierarchy, which it does not, navigating the hierarchy does not require “receiving from the user through the electronic display.” On the contrary, there are numerous ways of receiving from a user, such as through a keyboard stroke, a mouse selection, a voice command (although none of these are disclosed in Leymann either). Leymann fails to disclose any mechanism for receiving a selection from a user, and thus clearly fails to disclose the specific mechanism of receiving the selection through the electronic display.

Furthermore, the Examiner’s Answer later acknowledges “Leymann does not expressly teach receiving the methodology mapping selection from the user through the electronic display.” Examiner’s Answer, p. 9. However, the Examiner’s Answer asserts that Leymann teaches that the methodology mapping selection may be performed manually by a user, rendering it “abundantly obvious” that the methodology mapping selection would be received from the user through the electronic display. Examiner’s Answer, p. 9. Appellant disagrees. Leymann discloses that categorizing “individual application services/business processes into a taxonomy is typically done manually.” Leymann, ¶7. Thus, Leymann discloses that an item can be manually categorized in a taxonomy scheme. However, Leymann fails to disclose manually mapping, with the methodology mapping selection, a set of taxonomies to each methodology, as recited in independent claim 6. Categorizing an item in a taxonomy does not disclose or suggest mapping a methodology to a set of taxonomies.

3) “mapping...each methodology ... to a selection of a set of taxonomies from the user”

As previously discussed, Leymann discloses creating taxonomies for categorizing items. Leymann further fails to disclose a selection of a set of taxonomies from the user. In fact, Leymann fails to disclose a set of taxonomies or a plurality of methodologies altogether. Thus, Leymann further fails to disclose mapping a methodology to a set of taxonomies.

B. Claims 13-17 and 22-25 over Leymann in view of Pronstati

The Examiner’s Answer does not separately address the Appellant’s arguments in the Appeal Brief with respect to claims 13-17 and 22-25. Thus, the Appellant re-affirms the arguments of the Appeal Brief.

II. Conclusion

For the reasons provided above, Appellant submits that claims 6-8, 13-17, and 22-25 are allowable over the cited art. Appellant respectfully submits that the outstanding rejections of the claims are in error and should be reversed.

Respectfully submitted,

July 8, 2010

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